

RESPONSE UNDER 37 C.F.R. § 1.111  
U.S. Appln. No. 09/479,999  
Atty. Docket No. A7631

## **II. Claims 7-12 and 27-31 are patentable over Brown**

Claims 7-12 and 27-31 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Brown.

### *A. Claim 7*

Independent claim 7 recites a method for managing internet presentation materials in a single file format. Claim 7 recites "defining, in a first portion of the [single] file, a first variable equal to a first information and a second variable equal to a second information." Claim 7 also recites "defining, in a second portion of the [single] file, first and second presentation layouts, wherein the first presentation layout includes the first variable and the second presentation layout includes the second variable."

The Examiner acknowledges that Brown does not disclose defining in one file a variable for each information and defining in one file a presentation layout for each information, as recited in claim 7. Instead, the Examiner asserts that Brown discloses defining a variable for each information. The Examiner cites Brown's disclosure of the HREF (Hypertext Reference) keyword for creating a link to a URL. *See* #2 and #3 on page 678 of Brown. The Examiner then concludes that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Brown to include defining the variable and the presentation layout for the following reason:

A HTML page is generated by HTML code file including HTML tags. The fact that an item in the list is displayed on the right side of the web page in response to a user's selection from the list on the left side and the HREF with associated URL in the HTML codes of a web page for linking to the information of the URL suggest that in the program for executing that feature, such a variable-HREF and associated URL-- is defined for each

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correspondent information in order to retrieve that information for displaying with the corresponding presentation layouts. The variables in HTML tags of a web page, therefore, are defined in one HTML code file.

Even assuming *arguendo* that the Examiner's description of the functionality of the HTML tags is accurate, Brown still fails to teach or suggest the features of claim 7. In particular, the use of multiple anchor tags in an HTML document/file does not teach or suggest the features of claim 7. For example, each anchor tag is used to encapsulate a unique URL. *See, e.g.,* #1 and #2 on page 678 of Brown. Thus, the Examiner's characterization of this information as variable is erroneous. Furthermore, if a file path and/or file name are appended to the URL, then more than a single file is involved, contrary to claim 7.

Even further, URLs are usually associated with distinct files/documents. *See, e.g.,* page 676, lines 5-7 of Brown. The mere inclusion of multiple URLs in a single HTML document fails to teach or suggest "defining, in a first portion of the [single] file, a first variable equal to first information and a second variable equal to second information," as recited in claim 7. The URLs are not equal to the information. Instead, the URLs function as unique addresses/pointers that may point to information defined elsewhere. Brown acknowledges as much: "[s]imilar to a mailing address, the URL tells Internet browsers where to go when looking for specific information." *See* page 676, lines 7-8 of Brown.

Still further, Brown fails to teach or suggest "defining, in a second portion of the [single] file, first and second presentation layouts, wherein said first presentation layout includes said first variable and said second presentation layout includes said second variable," as recited in claim 7. The Examiner acknowledges this in the Office Action, at ¶ 5 on page 3. However, as

discussed above, the Examiner then concludes that it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify Brown to include defining the variable and the presentation layout for the following reason:

A HTML page is generated by HTML code file including HTML tags. The fact that an item in the list is displayed on the right side of the web page in response to a user's selection from the list on the left side and the HREF with associated URL in the HTML codes of a web page for linking to the information of the URL suggest that in the program for executing that feature, such a variable-HREF and associated URL-- is defined for each correspondent information in order to retrieve that information for displaying with the corresponding presentation layouts. The variables in HTML tags of a web page, therefore, are defined in one HTML code file.

The Examiner failed to provide any reference illustrating the underlying HTML code directed to displaying an item in a list on the right side of a web page in response to a user's selection from the list on the left side of the web page. Indeed, the use of frames and multiple files would support this functionality, albeit in a manner contrary to claim 7. *See, e.g.*, Applicants' Table 1. The Examiner failed to provide sufficient justification for modifying Brown, which discloses, for example, the use of frames for dividing a web page into regions. *See, e.g.*, page 163 of Brown. Therefore, without being able to review the underlying HTML code, there is no way of knowing whether the first and second presentation layouts are defined in a single file, which also defines the first variable and the second variable. *See, e.g.*, Applicants' Table 2.

Claim 7 also recites "generating a page of presentation material in response to a request for said first information, wherein the page is generated based on the first presentation layout and

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includes said first information and does not contain said second information." The general discussion and static images of Brown, relied on by the Examiner, fail to teach or suggest generating a page based on the first presentation layout and including the first information, both from the same file, wherein the generated page does not contain the second information also from the same file.

*B. Claims 8-10*

Claims 8-10 are patentable over Brown at least by virtue of their dependency.

*C. Claims 11-12*

The Examiner, noting claims 11-12 are for a system of method claims 7-10, rejected claims 11-12 under the same rationale. Therefore, Applicants traverse the rejection of claims 11-12 for at least the deficiencies of Brown discussed above.

*D. Claims 27-31*

The Examiner, noting claims 27-31 are for a system of method claims 7-10, rejected claims 27-31 under the same rationale. Therefore, Applicants traverse the rejection of claims 27-31 for at least the deficiencies of Brown discussed above.

For at least the above exemplary reasons, claims 7-12 and 27-31 are patentable over Brown.

**III. Examiner's Response to Applicants' Arguments**

The Examiner indicated that Applicants' arguments filed on February 14, 2002, were fully considered but that they are not persuasive. Because Applicants disagree, for at least the following reasons, Applicants maintain the viability of these arguments filed in response to the Office Action of December 21, 2001.

The Examiner asserts that it is well known "that on a web page where the browser window is divided into independent sections like a left pane and a right pane, *the items on the left side are included in the list of content and are hyperlinks* so that if one item is selected, the corresponding page is displayed on the right side of the page." The Examiner's own description of a corresponding page being loaded in response to the selection of a hyperlink would seem to support the conclusion that a separate file (for the different page) is being used.

The Examiner concludes that "conventionally the information of Cyberspace Showdown III or the information of Raider's Fan Wins Contest or NFL teams will be loaded and displayed on the right side of the web (not conventionally loading a new page) if a user activates on the Cyberspace Showdown III or Raider's Fan Wins Contest or NFL hyperlinks." Applicants respectfully submit that the Examiner's interpretation of what will happen upon a user selecting one of these alleged hyperlinks is mere speculation without an inspection of the underlying HTML code that defines the hyperlinks.

The Examiner agrees "that the figure 1.4 as seen is how the NFL home page is laid out and the NFL teams information may not be in response to a user request." However, the Examiner again asserts that "as stated above, by convention, when one of the links in the list from the left side is selected, for example, Cyberspace Showdown III or Raider's Fan Wins Contest, the information of that link will be displayed on the right side." The Examiner also asserts that afterwards, "if a user selects the NFL link, the NFL teams information will be displayed on the right side again as seen on figure 1.4 [of Brown]." Applicants again submit that the Examiner has provided no support for these conclusions interpreting either the present state

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of or possible future states of the web page displayed in figure 1.4 of Brown. Indeed, without an ability to inspect the underlying HTML code, the static figure 1.4. of Brown tells us very little about the structure and functionality of the web page. For example, it is impossible to confirm by mere inspection of Fig. 1.4 whether the phrases "Cyberspace Showdown III" and "Raider's Fan Wins Contest!" are actually hyperlinks. For at least these exemplary reasons, the Examiner's conclusion that "[t]he display as seen on figure 1.4, therefore, is still in response to a user request" appears unsubstantiated.

In an effort to remedy this deficiency, the Examiner provides another page of Brown in an effort to provide such substantiation. The Examiner asserts that Brown "shows one more case that by convention when one of the items in the list on the left side is selected, only information related to the link selected is displayed on the right side of the web page." *See* Fig. 7.15 on page 163 of Brown. Figure 7.15 of Brown uses frames to display a list of people in one frame and to display the resumé of the current selected person in another frame. *See* page 163 of Brown. Applicants acknowledge this approach of using frames. *See, e.g.,* Applicants' specification at page 5, line 19 to page 7, line 17. However, the Examiner has failed to establish how this use of frames teaches or suggests the features of the claimed invention. The use of frames can occur through the use of multiple files. *See, e.g.,* Applicant's Table 1. Thus, for example, in Brown, each listed person's resumé could be stored as a separate file. Once again, the Examiner's reliance on a static image, without an ability to inspect the underlying HTML code, does not provide sufficient grounds to render the claimed invention unpatentable.

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#### **IV. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to be charged to Deposit Account No. 19-4880.

Respectfully submitted,



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